

COMMENTS IN REGARD TO PETITIONS RM-10806, RM-10807, RM-10808, RM-10809, RM-10810, and RM-10811

ELIMINATION OF AMATEUR MORSE CODE REQUIREMENTS

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Dear Sirs:

I have been a Commission licensee since 1965, and have held an Amateur Extra Class license for more than 25 years. I am proficient in Morse Code, and truly enjoy that mode of operation, which I do not consider to be at all obsolete. Rather, Morse CW is the most appropriate mode in many situations.

However, I also believe that the current Amateur licensing structure is inequitable, and not good for the long term health of the service.

To me, the most disturbing aspect of the current license structure is the difference in real, meaningful privileges enjoyed by newcomers to the hobby, depending on where they happen to live. A new technician licensee in a highly populated place, like most of the eastern seaboard or California can generally find enough activity on VHF and UHF to keep him very busy. A new licensee in rural America, like much of the upper Midwest and less populated western states, may find that he has access to very few other amateurs. The result is often immediate loss of interest, and loss of a new licensee. This is an inequity that needs to be addressed.

Young people who've never experienced its real utility can't understand why anyone would want to use Morse Code. It is viewed as archaic by the population at large, and parents would rather see their children devote their time to things that will lead directly to employment, such as computers. Kids today also do not have the free time that the previous generations did.

I have reviewed the petitions filed above, and agree, in general with many of the ideas put forth. I do believe that the Morse requirement should be eliminated for the General Class and any lower class licenses. This will help to resolve the inequities in the license structure, and encourage continued growth of the amateur population.

I will not object if Element 1, the Morse Code examination, is simply removed. However, I feel that this should be part of a broader set of changes which I ask the Commission to consider.

First, most of the petitioners feel that the current Technician licensees should simply be granted the existing Novice/Technician HF privileges. In RM-10781, the petitioner requests new sub-bands be created to accommodate the Technicians. However, if the Morse requirement for General Class is retained, this is just a way to continue the status quo, and will probably resolve nothing.

Japan has had a no-code HF amateur license in place for many years, in spite of the ITU regulations. Now, Great Britain, Germany, Austria, and many other administrations have eliminated their Morse requirements. For this reason alone, I think it will be very difficult to justify retention of the Morse requirements in the United States.

Instead, I feel that the Commission should reconsider a proposal made previously by the American Radio Relay League (ARRL), which asked that the Commission eliminate the current Novice/Technician bands and refarm them to provide additional phone and digital frequencies for all licensees. I feel that this is a much better use of the spectrum, and will benefit all license classes. The current Novice bands are not heavily used, and they impose a lower power limit on all licensees operating there. Refarming these bands would allow more spectrum for all users.

I would urge the Commission to likewise eliminate the Advanced Class exclusive voice bands, since the Advanced Class is no longer being issued.

Secondly, the ARRL petitioned that existing Technicians be granted access to the HF CW bands.

I believe that this was a very wise suggestion, and one that should be adopted immediately. Today, computer equipment makes it possible to copy machine-sent Morse code very efficiently. I believe that granted these HF privileges, a large number of Technicians would choose to try CW using their computers. If a 'standard' speed were chosen, say 18 WPM like the ARRL Bulletins, the Technicians could enjoy fine Morse communications that could also be enjoyed by most other code-proficient operators. If the technique became popular, many existing amateurs that do not currently operate Morse might be encouraged to try it. The result will be more, not less, Morse activity on the bands. Newcomers who want to be truly competitive will soon realize that they need to learn to copy Morse by ear, and will be incented to do so.

It is very unlikely that we will ever see a return to the conditions of the 1960's and 70's, when the Novice bands were full of newcomers, all trying to communicate in very slow speed Morse. I believe that we will have a better result if we grant Technicians access to all the CW subbands except those reserved for Extra Class. I believe modern newcomers would be more inclined to try computer-based Morse, which is compatible with others operating CW in the General band. I would limit their power to an appropriate value. The current Novice limit was based on the inefficiency of tube-type amplifiers when operated at lower power levels. This limitation does not apply to modern solid-state equipment. Therefore, I think that a power limit of 50 watts output would be appropriate.

With these changes, newcomers would have immediate access to HF, making the Technician license useful and desirable even in the most rural areas of the country, where the existing entry license is not very practical due to a lack of VHF activity. Technicians who want to will be exposed to HF CW. Those that do not wish to try CW can simply take the written exam for General Class and upgrade to obtain voice and higher power privileges.

I agree with the petitioner in RM-10784, in that I believe that the Element 1 exam should be kept in place for the Extra Class license. This is simply to ensure that there is still some small incentive for amateurs to learn the code. Since most of the exclusive Extra Class privileges are in the CW bands, there should be little objection, as the privileges granted are appropriate to the

test element. Those who do not wish to learn Morse can gain nearly all amateur privileges without it.

To summarize, I suggest that Element 1 be eliminated for the General Class license, and that current Technicians be granted access to all HF CW bands except those reserved for Extra Class, with a reduced power limit of 50 watts output. I also suggest that the existing Novice and Advanced sub-bands be refarmed for general use by all licensees. Novices should be granted the new Technician HF privileges, and Technicians should be granted the current Technician with Code voice privileges on 10 meters.

Bands and privileges would resemble the following. I have modified this somewhat from the bandplans previously filed in comments on other related petitions to add privileges on 160 meters, and include digital modes for 20 meters that were previously overlooked. If any band restriction is adopted, I would restrict the Technicians from the 20 meter band as an incentive to upgrade.

Granting voice privileges on 160 meters and 10 meters would return our entry licensees to the privileges enjoyed by 'Class B' amateurs prior to World War II.

1800 to 2000 Khz - Novice, Technician and higher CW, digital, Phone and Image

3500 to 3525 Khz. - Amateur Extra CW only
3525 to 3675 Khz. - Novice, Technician and higher CW
3525 to 3675 Khz. - General and higher digital modes
3675 to 3700 Khz. - Amateur Extra Phone and Image
3700 to 4000 Khz - General and higher Phone and Image

60 meters - no Technician privileges

7000 to 7025 Khz - Amateur Extra CW only
7025 to 7125 Khz - Novice, Technician and higher CW
7025 to 7125 Khz - General and higher digital modes
7125 to 7300 Khz - General and higher Phone and Image

10100 to 10150 - Novice, Technician and higher CW and digital modes

14000 to 14025 - Amateur Extra CW only
14025 to 14150 - Novice, Technician and higher CW (optional)
14025 to 14150 - General and higher digital modes
14150 to 14175 - Amateur Extra voice and image only
14175 to 14350 - General and higher voice and image

18068 to 18110 - Novice, Technician and higher CW
18068 to 18110 - General and higher digital modes
18110 to 18168 - General and higher voice and image

21000 to 21025 - Amateur Extra CW only
21025 to 21150 - Novice, Technician and higher CW
21025 to 21150 - General and higher digital modes
21150 to 21175 - Amateur Extra voice and image
21175 to 21450 - General and Higher voice and image

24890 to 24930 - Novice, Technician and higher CW
24890 to 24930 - General and higher digital modes
24930 to 24990 - General and higher voice and image

28000 to 28300 - Novice, Technician, and higher CW
28000 to 28300 - General and higher digital modes

28300 to 28500 - Technician and higher voice and image
28500 to 29700 - General and higher voice and image

COMMENTS IN REGARD TO SPECIFIC PETITIONS:

RM-10805 - I agree, in general with this petition, and could accept these results. However, I feel that in order to prevent this issue from being revisited again and again over the next few decades as more and more other nations eliminate their code requirements, elimination of the code tests for General Class would be a good idea. I would also strongly suggest that the Technicians be granted digital mode and CW privileges on 30 meters since it is not heavily utilized, and suggest that 20 meters be reserved for higher licensees, since it is already very busy. I agree with the power limit suggested here, but would prefer to see it reduced to 50W.

RM-10806 - I disagree with this petition. The current license structure is inequitable and unjustifiable, and the commission has previously rejected the arguments put forth in this petition.

RM-10807 - I disagree with retaining the status quo - Morse testing should be eliminated, except for the Extra Class.

RM-10808 - I disagree with much of this petition. A CW test should never be required for those who want to operate CW, any more than a proficiency test in playing the piano should be required of anyone who wants to learn to play.

RM-10809 - I disagree with this petition. I agree that dropping the code exam is a good idea, but there is no reason to increase the difficulty of the current entry level written exam. If more technical rigor is to be required, it should be required at the Extra Class level, only. However, I do not feel that this is justified. There is a widespread, and false impression in the Amateur community that the current exams are too easy, however, I believe that the current Technician exam is much harder than the old entry Novice exam, but not quite as difficult as the old General - though there are far more topics than on the old exam. Only if the Commission chooses to merge the Technician and General exams, should they consider increasing the difficulty of this written exam. If this is done, I fear that we will soon be back before the commission, petitioning for them to create a new entry level license class, because the new exams are too difficult for most people.

RM-10810 - This is a novel petition which has some merit. However, I do not feel that the entry technical exam should be made more difficult, nor should the Extra written exam be eliminated. Retention of a code test for Extra Class seems to be a very popular idea - I don't feel that the speed required is an important issue. If the commission raises the current code speed requirement, it will need grandfather all existing Extra Class licensees, perhaps except for those of us who can prove that we held our Extra licenses before the code requirement was dropped to 5 WPM.

RM-10811 - I agree with granting current Technicians digital privileges in the HF bands. However, I do not feel that they should be restricted to the old Novice bands, and I feel that they should have at least some voice privileges on HF. Again, I feel that retention of the code test for General Class is not in the best interests of Amateurs because, over time, this issue will resurface again and again. But, as long as the Technicians are granted some meaningful HF privileges, I would be willing to support retention of the General code test. As previously explained, I do not feel that is in the best interests of amateur

radio to retain the current Novice sub-bands - these sub-bands should be redeployed to benefit all amateurs. Simply eliminating the code test for the Technician with code license, however, does not sufficiently address the inequities of the current situation, nor the needs of amateur radio in the 21st century. I believe that in the public interest, the commission will sooner or later be compelled to eliminate the code tests for all but the Amateur Extra Class examination.